

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHWESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

HARLEY WAYNE SCHRADER,

Defendant.

No. 19-5041-01-CR-SW-SRB

UNITED STATES' MOTION TO FILE ITS MOTION TO DETAIN UNDER SEAL

The United States of America, through Timothy A. Garrison, United States Attorney for the Western District of Missouri, and by the undersigned Assistant United States Attorney requests leave from the Court to file its motion to detain under seal. In support of its motion, the Government offers the following suggestions:

1. The defendant has been charged with four counts of sexual crimes against minor victims, who are identified as Jane Doe 1 and Jane Doe 2 in the superseding indictment. (Doc. 1.)
2. This Court has set a detention hearing in this case for September 10, 2019.
3. The Government's motion to detain will contain sensitive details regarding the minor victims.
4. Consequently, the Government is requesting permission to file its motion to detain under seal.

WHEREFORE, the United States requests a leave to file its motion to detain under seal.

Respectfully submitted,

Timothy A. Garrison
United States Attorney

By /s/ Ami Harshad Miller
Ami Harshad Miller
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was delivered on September 9, 2019, to the CM-ECF system of the United States District Court for the Western District of Missouri for electronic delivery to all counsel of record.

/s/ Ami Harshad Miller
Ami Harshad Miller
Assistant United States Attorney